

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN DISASTER  
SITE LITIGATION

21 MC 102 (AKH)

CARLOS MERCHAN,

07-CV-01665 (AKH)

Plaintiff,

-against-

**NOTICE OF DEFENDANT VERIZON  
NEW YORK INC.'S ADOPTION OF  
ANSWER TO MASTER COMPLAINT**

VERIZON NEW YORK INC.,  
et al.

Defendants.

PLEASE TAKE NOTICE THAT Defendant Verizon New York Inc. (“Verizon”) hereby adopts as its Answer in the instant case its Answer to Plaintiffs’ Master Complaint which was filed and served on October 16, 2007 in the matter of In re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). In accordance with Case Management Order No. 4, the allegations of the instant Check-Off Complaint are deemed to be denied. Verizon also incorporates by reference all averments and denials of its Answer to Plaintiffs’ Master Complaint as though same were more fully set forth herein at length. Verizon further adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Verizon reserves the right to file and serve an amended answer and specifically reserves the right to interpose cross-claims and third-party claims.

WHEREFORE, Verizon demands judgment dismissing the above-captioned action as against Verizon, together with its cost and disbursements.

Dated: November 26, 2007

/s/ Eric F. Leon  
Eric F. Leon  
Lee Ann Stevenson  
Andrew Dunlap  
Michael D. Reisman  
KIRKLAND & ELLIS LLP  
Citigroup Center  
153 East 53rd Street  
New York, New York 10022-4611  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900

*Attorneys for Defendant Verizon New York Inc.*

TO: Christopher LoPalo, Esq.  
WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
115 Broadway, 12th Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
ROBERT A. GROCHOW, P.C.  
233 Broadway, 5th Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
LAW OFFICES OF GREGORY J. CANNATA  
233 Broadway, 5th Floor  
New York, New York 10279

**Liaison Counsel for Plaintiffs**

Marc D. Weinblatt, Esq.  
SANDERS, SANDERS, BLOCK, WOYICK, VIENER & GROSSMAN, P.C.  
100 Herricks Road  
Mineola, New York 11501

David Kremen, Esq.  
OSHMAN & MIRISOLA, LLP  
42 Broadway, 10th Floor  
New York, NY 10004

**All Defense Counsel (via ECF)**